

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

LONGMEADOW ONE SOLAR LLC;  
LONGMEADOW TWO SOLAR LLC;  
BWAY PLYMOUTH SOLAR LLC; BWAY  
DY HS SOLAR LLC; SELF STORAGE  
SOLAR 22 LLC,

Plaintiffs,

v.

TRINA SOLAR CO., LTD. F/K/A  
CHANGZHOU TRINA SOLAR ENERGY  
CO., LTD; TRINA SOLAR (U.S.), INC.,

Defendants.

CIVIL ACTION NO.: 3:24-cv-03223-GC-  
JBD

**STIPULATION AND CONSENT ORDER  
AS TO FURTHER AMENDMENT OF  
THE COMPLAINT AND BRIEFING  
SCHEDULE ON MOTION TO DISMISS**

**THIS MATTER**, having been opened to the Court by Eckert Seamans Cherin & Mellott, LLC, Attorneys for Plaintiffs, Longmeadow One Solar LLC, Longmeadow Two Solar LLC, BWAY Plymouth Solar LLC, BWAY DY HS Solar LLC, and Self Storage Solar 22 LLC (collectively, “Plaintiffs”), and by Jones Day, Attorneys for Defendants, Trina Solar Co., LTD. F/K/A Changzhou Trina Solar Energy Co., LTD and Trina Solar (U.S.), Inc. (individually, “Defendants,” together with “Plaintiffs,” the “Parties”), and for other good cause appearing;

**IT IS HEREBY STIPULATED AND AGREED**, by and between the Parties that, in view of the April 5, 2024 Pre-Motion Conference Letter filed by Defendants [ECF No. 12], the April 11, 2024 response thereto previously filed by Plaintiffs [ECF No. 13], and the Parties’ joint report to the Court dated November 22, 2024 [ECF No. 26], Plaintiffs are granted leave to proceed with the filing of a Second Amended Complaint in this action;

**IT IS FURTHER STIPULATED AND AGREED** that the Parties shall comply with the following schedule in relation to Plaintiffs' Second Amended Complaint:

- **January 6, 2025** – Plaintiffs shall file a Second Amended Complaint;
- **February 3, 2025** – Defendants shall file a motion or other response to the Second Amended Complaint. Any such motion shall be returnable March 3, 2025.

**IT IS SO ORDERED** on this 2<sup>nd</sup> day of January, 2025.



J. BRENDAN DAY  
UNITED STATES MAGISTRATE JUDGE

The undersigned hereby consent to the form and entry of the within Order.

**ECKERT SEAMANS CHERIN &  
MELLOTT, LLC**

**JONES DAY**

BY: /s/ Nicholas M. Gaunce  
Nicholas M. Gaunce, Esq.  
*Attorneys for Plaintiffs*

BY: /s/ David A. Ciarlo  
David A. Ciarlo, Esq.  
*Attorneys for Defendants.*

Dated: December 12, 2024

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